IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

as Liquidation Trustee of the Sentinel Liquidation Trust, Assignee of certain claims,) Case No. 09 CV 2258
Plaintiff, v.)) Honorable James B. Zagel
FTN FINANCIAL SECURITIES CORP., FIRST TENNESSEE BANK N.A., and JACQUES DE SAINT PHALLE,)))
Defendants.)
FREDERICK J. GREDE , not individually but as Liquidation Trustee of the Sentinel Liquidation Trust,)))
Plaintiff,) Case No. 08 CV 6587
STEPHEN M. FOLAN, JACQUES DE SAINT PHALLE, FTN FINANCIAL SECURITIES CORP., and FIRST TENNESSEE BANK N.A.,	Honorable James B. Zagel))
Defendants.)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on November 8, 2011 at 10:15 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable James B. Zagel in Room 2503 of the United States District Court for the Northern District of Illinois, Eastern Division, Dirksen Building, 219 South Dearborn Street, Chicago, Illinois, or any other judge sitting in his stead, and then and there present the attached **Joint Motion for Finding of Good Faith Settlement and For a Contribution Bar**, at which time and place you may appear if you so desire.

PLEASE TAKE FURTHER NOTICE that the relief sought herein includes a Contribution Bar Order and a finding that a settlement was entered into in good faith and that the

Contribution Bar Order and/or the good faith finding may affect the rights of persons receiving this Notice. All such persons who object to any of the provisions of the proposed Order attached hereto as Exhibit A are invited to appear in person or through counsel at the above-referenced place and time to be heard by the Court.

Dated: October 21, 2011 Respectfully submitted,

/s/ Jeffrey S. Eberhard

J. Kevin McCall (ARDC # 03125685) Chris C. Gair (ARDC # 6190781) Jeffrey S. Eberhard (ARDC # 6276471) JENNER & BLOCK LLP 353 N. Clark Street Chicago, IL 60654 Telephone: (312) 222-9350 jmccall@jenner.com cgair@jenner.com jeberhard@jenner.com

Attorneys for Frederick J. Grede

/s/ Michael B. Slade

Michael B. Slade (ARDC #6274231) Brian D. Sieve, P.C. (ARDC #6199741) KIRKLAND & ELLIS LLP 300 N. LaSalle Street Chicago, Illinois 60654-6636 Telephone: (312) 862-2000

mslade@kirkland.com

Howard M. Shapiro
Patrick J. Carome
John A. Valentine
Jeannie S. Rhee
WILMER CUTLER PICKERING HALE
AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Telephone: (202) 663-6000
howard.shapiro@wilmerhale.com
patrick.carome@wilmerhale.com
john.valentine@wilmerhale.com
jeannie.rhee@wilmerhale.com

- and -

Mark D. Griffin
Kristine L. Roberts
Lori H. Patterson
BAKER, DONELSON, BEARMAN, CALDWELL
& BERKOWITZ, PC
First Tennessee Building
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: (901) 526-2000
mgriffin@bakerdonelson.com
klroberts@bakerdonelson.com
lpatterson@bakerdonelson.com

Attorneys for FTN Financial Securities Corp., First Tennessee Bank National Association, Stephen M. Folan and Jacques de St. Phalle /s/ William Gibbs Sullivan

William Gibbs Sullivan
Royal B. Martin
MARTIN, BROWN, SULLIVAN, ROADMAN
& HARTNETT, LTD
135 S. LaSalle St., Ste. 3200
Chicago, IL 60603
Telephone: (312) 360-5000

Telephone: (312) 360-5000 sullivan@mbsrhlaw.com martin@mbsrhlaw.com

Attorneys for Stephen M. Folan and Jacques de. St. Phalle